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CHRISTOPHER J. BOWES, ESQ. 54 Cobblestone Drive Shoreham, NY 11786

Tel. (212) 979-7575 Fax (631) 929-1700 cjbowes@gmail.com USDC SDNY
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January 15, 2021

Via ECF

Hon Barbara C. Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: <u>Johnson v. Saul</u> 20 Civ. 2630(BCM)

Dear Judge Moses:

I am writing to request an extension of time, <u>nunc pro tunc</u>, in which to file plaintiff's Motion for Judgment on the Pleadings in this case. Plaintiff's papers were due to be filed on January 7, 2021. This is plaintiff's second request for an extension of time.

Regrettably, due to inordinate work and family scheduled, I have not been able to complete these paper as anticipated. I have multiple matters which have unfortunately bottlenecked and made it difficult to complete these papers. I apologize to the Court and opposing counsel for these delays. With the kind consent of opposing counsel, Oona Peterson, Esq., I respectfully request that the Court approve the following revised schedule:

January 22, 2021 Plaintiff's Motion for Judgment on the Pleadings March 23, 2021 Defendant's Motion for Judgment on the Pleadings April 7, 2021 Plaintiff's Reply

Thank you for Your Honor's attention to this matter.

Very truly yours,

<u>/s/ Christopher J. Bowes</u> Christopher J. Bowes, Esq

cc: AUSA Oona Peterson

Application GRANTED. The revised schedule is adopted in its entirety. SO ORDERED.

Barbara Moses, U.S.M.J.

January 15, 2021